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May 21, 2007

VIA FEDERAL EXPRESS

Hon. Charles L. Brieant United State District Judge United States District Court Southern District of New York 300 Quarropas Street White Plains, New York 10601

Re: Freddy M. Morocho et al. v. George C. Kelly et al.

07 Civ. 2979 (CLB) (MDF)

Dear Judge Brieant:

We have just been retained to represent the Defendants in the above-referenced matter. For the reasons discussed herein, I write to request a short adjournment of the Case Management Conference currently scheduled for June 15, 2007. Plaintiffs' counsel consents to this request.

Having just been retained, we need some time to discuss this matter with our clients and to investigate the claims. We intend to meet with our clients next week. In addition, the parties need a reasonable period of time to comply with Federal Rule of Civil Procedure 26(f), as outlined in the Notice of Court Conference for this matter which Plaintiffs' counsel has forwarded to me.

Plaintiffs' counsel has agreed to extend Defendants' time to respond to the Complaint to June 15, 2007 (if I am able to adjourn the Case Management Conference). I have conferred with Plaintiffs' counsel and we are available to appear on the following dates for the Case Management Conference: July 12, 18, 19, 20, 25 and 27. No prior request for an adjournment has been made in this matter.

Thank you for your consideration.

Respectfully submitted.

Louis R. Satriale.

cc: Karen Zdanis, Esq. (via Federal Express) Counsel for Plaintiffs